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Attorneys for Defendants
SONOMA COUNTY SHERIFF'S DEPARTMENT,
BILL COGBILL and COUNTY OF SONOMA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VALERIE GEORGE, as Administrator and
Personal Representative of THE ESTATE OF
RYAN GEORGE; VALERIE GEORGE and
TAJMAH BEAUCHAMP, as Legal
Representatives for Jaida George and Ryan
George, Jr.; VALERIE GEORGE, Individually;
DONALD GEORGE; and TAJMAH
BEAUCHAMP, Individually,

Plaintiffs,

vs.

SONOMA COUNTY SHERIFF'S
DEPARTMENT; BILL COGBILL; COUNTY
OF SONOMA; CALIFORNIA FORENSIC
MEDICAL GROUP, INC.; JAMES LUDERS,
M.D.; MICHAEL E. DAGEY, R.N.; SUTTER
HEALTH; SUTTER MEDICAL CENTER OF
SANTA ROSA; EDWARD W. HARD, M.D.;
RICHARD FLINDERS, M.D.; JOSEPH N.
MATEL, M.D.; NORICK JANIAN, M.D.; and
DOES 1 through 25, inclusive,

Defendants.

Case No.: 3:08-cv-02675-EDL

STIPULATION EXTENDING DEADLINE
FOR MEDIATION AND [PROPOSED]
ORDER

IT IS HEREBY STIPULATED AND AGREED by and among the parties hereto, through
their attorneys of record, that the deadline for the completion of mediation shall be extended to
March 31, 2010. The parties believe that mediation will be most effective if they have completed
non-expert discovery first but, due to conflicts in counsels' calendars, the parties will not be able to

complete all non-expert depositions by the current deadline of October 30, 2009. By separate pleading, they will be seeking a two month extension of that deadline. Also, the mediator agreed upon by all parties, Hon. Rebecca Westerfield (Ret.), has no available dates in December 2009, and she has only limited availability in the first two months of 2010. Accordingly, the parties are seeking an extension of the mediation deadline from December 31, 2009 to March 31, 2010.

DATED: October 30, 2009

SANFORD, WITTELS & HEISLER LLP
Attorneys for Plaintiffs

By: /s/
Steven L. Wittels, Esq.

DATED: October 30, 2009

SPAULDING McCULLOUGH & TANSIL LLP
Attorneys for Defendants
SONOMA COUNTY SHERIFF'S DEPARTMENT,
BILL COGBILL and COUNTY OF SONOMA

By: /s/
Terry S. Sterling, Esq.

DATED: October 30, 2009

TRIMBLE, SHERINIAN & VARANINI
Attorneys for Defendants
CALIFORNIA FORENSIC MEDICAL GROUP,
INC.; JAMES LUDERS, M.D. and MICHAEL E.
DAGEY, R.N.

By: /s/
Jerome M. Varanini, Esq.

DATED: October 30, 2009

LAFOLLETTE, JOHNSON, DEHAAS, FESLER &
AMES
Attorneys for Defendant
SUTTER MEDICAL CENTER OF SANTA ROSA

By: /s/
Larry Byron Thornton

1 DATED: October 30, 2009

HASSARD BONNINGTON LLP
Attorneys for Defendants
JOSEPH N. MATEL, M.D. and RICHARD
FLINDERS, M.D.

2
3
4 By: /s/
5 Joanna L. Storey, Esq.

6 DATED: October 30, 2009

7 ROGASKI, PREOVOLOS, WEBER &
8 PATTERSON, LLP
Attorneys for Defendant
NORICK JANIAN, M.D.

9
10 By: /s/
11 Chester A. Rogaski, Jr., Esq.

[PROPOSED] ORDER

This Court, having read and considered the Stipulation set forth above, and good cause appearing therefore,

IT IS HEREBY ORDERED that the deadline for the completion of mediation is extended from December 31, 2009 to March 31, 2010.

DATED: November 3, 2009

